

13212 N MacArthur Blvd Oklahoma City, Oklahoma 73142 Tel. 832.374.0004 ntgenvironmental.com

November 18, 2024

Mike Bratcher District Supervisor Oil Conservation District 811 S. First Street Artesia, New Mexico 88210

Re: Incident Closure Report

Caza Operating, LLC

Comanche 25-36 Fed State CTB

Unit B, Section 25, Township 26S, Range 35E Site Coordinates: 32.02050082, -103.3173637

Lea County, New Mexico

Incident ID: nAPP2213324254

Introduction

NTG Environmental, LLC (NTGE), on behalf of Caza Operating, LLC (Caza), submits this Incident Closure Report to the New Mexico Oil Conservation Division (NMOCD). This report provides documentation of liner inspection activities conducted to date in the affected areas at the Comanche 25-36 Fed State CTB (Site). The Site is in Unit Letter B, Section 25, of Township 26 South and Range 35 East in Lea County, New Mexico. The GPS coordinates for the release site are 32.02050082° N Latitude and -103.3173637° W Longitude. The Site location with respect to the nearest town is shown on Figure 1 and the topography of the area is shown on Figure 2.

Background

Based on the initial C-141 submitted by Caza and obtained by the New Mexico Oil Conservation District (NMOCD), the release was discovered on May 10, 2022. The release was the result of an equipment failure, resulting in the release of ten (10) barrels (bbls) of produced water into lined containment, of which ten (10) bbls were recovered. Upon discovery the well was shut-in, and the area was secure. The liner area is shown in Figure 3.

Groundwater and Site Characterization

Based on a review of the New Mexico Office of State Engineers and USGS databases, there is one known water source within a ½-mile radius of the Site. The water well (C-02272) was drilled in 2015 to a depth of 496 feet below ground surface (ft bgs) and groundwater was encountered at 250 ft bgs. No other receptors (playas, wetlands, waterways, lakebeds, or ordinance boundaries)

Creating a Better Environment For Oil & Gas Operations

are located within each specific boundary or distance from the Site. According to the Karst Potential Map, the Site is located within a Low Karst area. The Site characterization documentation (Points of Diversion, Karst Potential, Significant Watercourse Map, Wetlands Map, and FEMA Map) is attached to the report.

NTGE characterized the Site according to Table I, Closure Criteria for Soils Impacted by a Release, from the New Mexico Administrative Code (NMCA) Title 19, Chapter 15, Part 29, Section 12 (NMAC 19.15.29.12).

General Site Characterization and Groundwater:

Site Characterization	Average Groundwater Depth (ft)
Low Karst	496'

Table 3.1 Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12 & 19.15.29.13)

Regulatory Standard	Chloride	TPH	TPH	BTEX	Benzene
		(GRO+DRO+MRO	(GRO+MRO)		
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release	600 mg/kg	100 mg/kg		50 mg/kg	10 mg/kg
19.15.23.12 Remediation and Closure Criteria for Soils Impacted by a Release (>4 Feet)	20,000 mg/kg	2,500 mg/kg	1000 mg/kg	50 mg/kg	10 mg/kg
Notes: = not defined					

Liner Inspection Activities

On November 13, 2024, NTGE conducted site assessment activities to assess the integrity and state of the tank battery's secondary containment liner. Upon inspection it was noted that the liner was intact with no visible holes or breaches, and free of any standing fluids. A photographic log documenting the condition of the liner at the time of the inspection is attached.

Closure Request

Based on the assessment and subsequent site assessment activities, the Site is compliant with NMOCD's regulatory requirements, and no further actions are required at the Site. Caza formally requests closure for the Site (nAPP2421941185). If you have any questions regarding this report or need additional information, please contact us on (832) 374-0004.

A NTG ENVIRONMENTAL

NTGE Project No: 248966

Sincerely,

NTG Environmental

Keller Ditt

Kellan Smith Project Manager

Attachments:

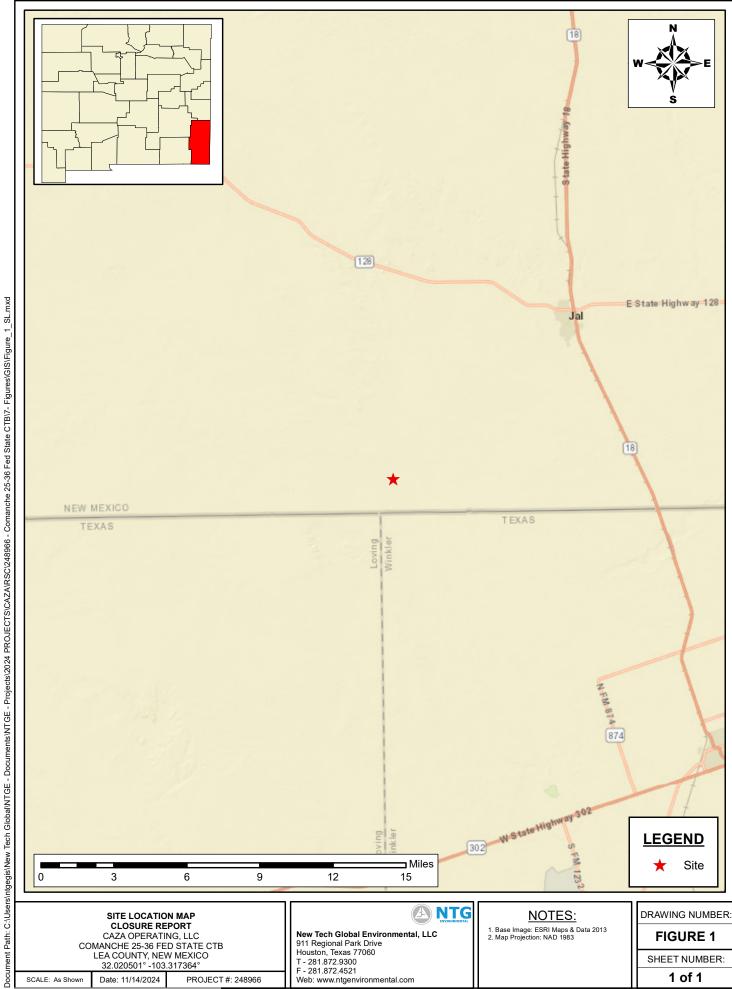
Figures Site Characterization Photographic Log

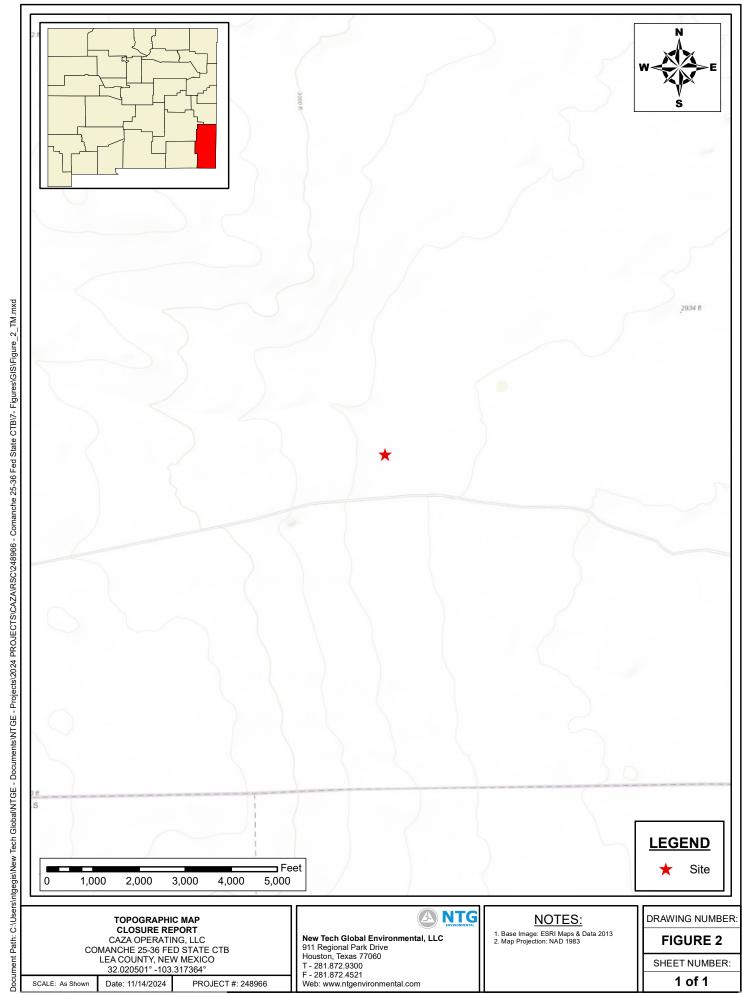


Figures

ANTG

NTGE Project No: 248966







SCALE: AS SHOWN

DATE: 11/14/2024

PROJECT #: 28966

ANTG

New Tech Global Environmental, LLC 911 Regional Park Drive Houston, Texas 77060 T - 281.872.9300 F - 281.872.4521 Web: www.ntgenvironmental.com

NOTES:

1. Base Image: ESRI Maps & Data 2017 2. Map Projection: NAD 1983

DRAWING NUMBER:

FIGURE 3

SHEET NUMBER:

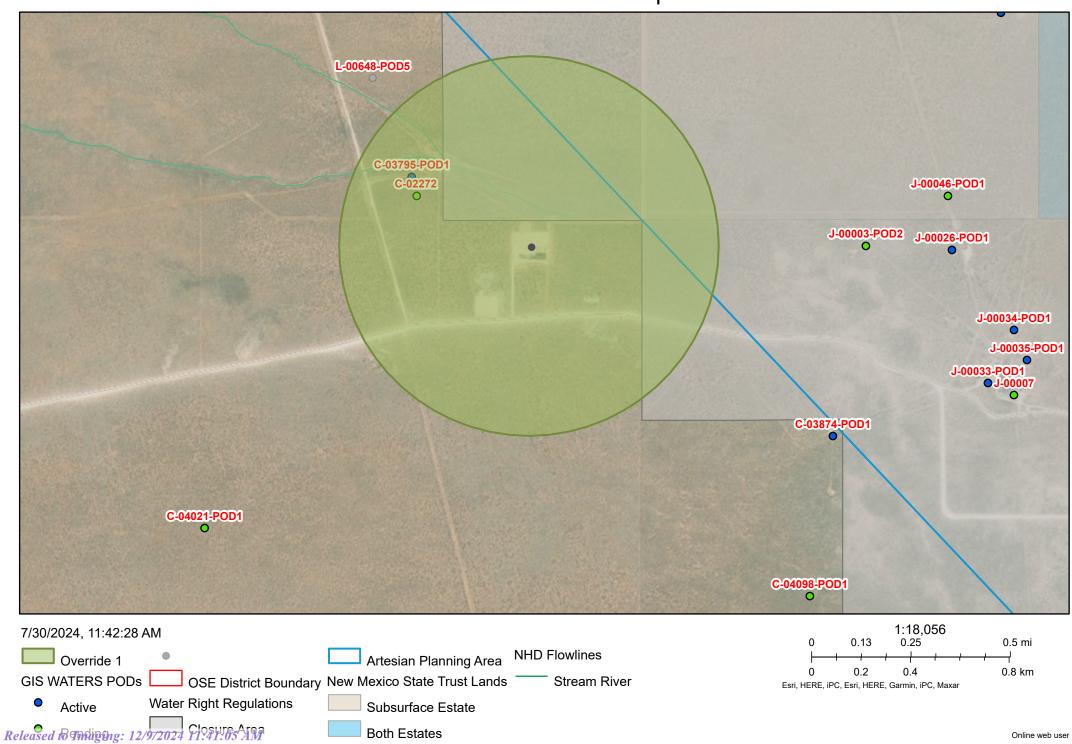
1 of 1

Site Characterization

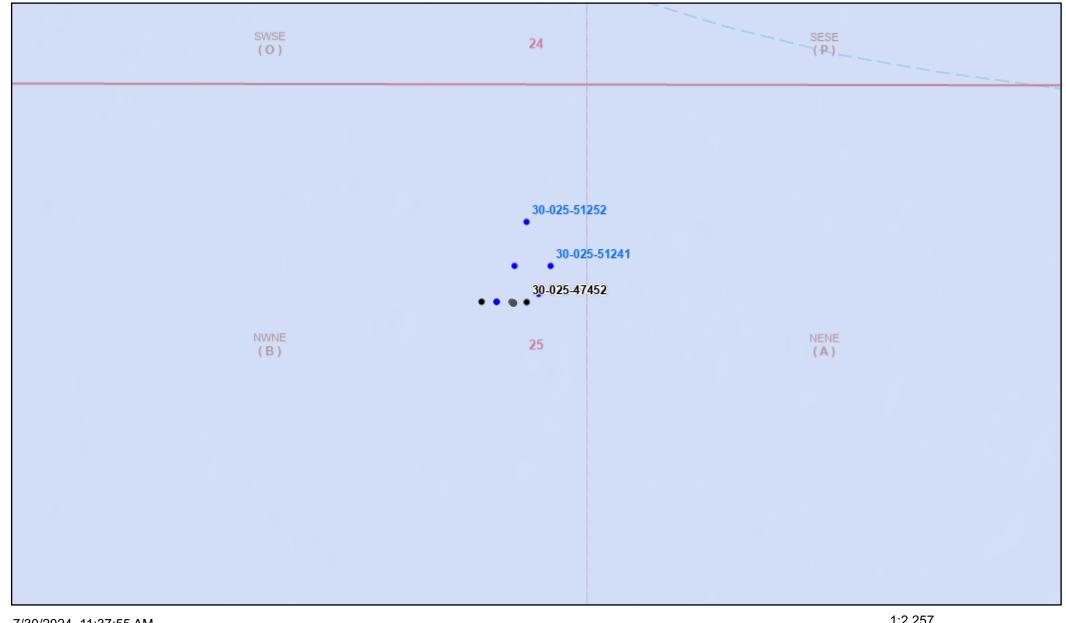
NTGE Project No: 248966



OSE POD Location Map



OCD Well Locations

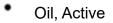


7/30/2024, 11:37:55 AM

Wells - Large Scale Karst Occurrence Potential



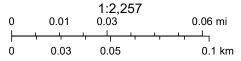
PLSS First Division



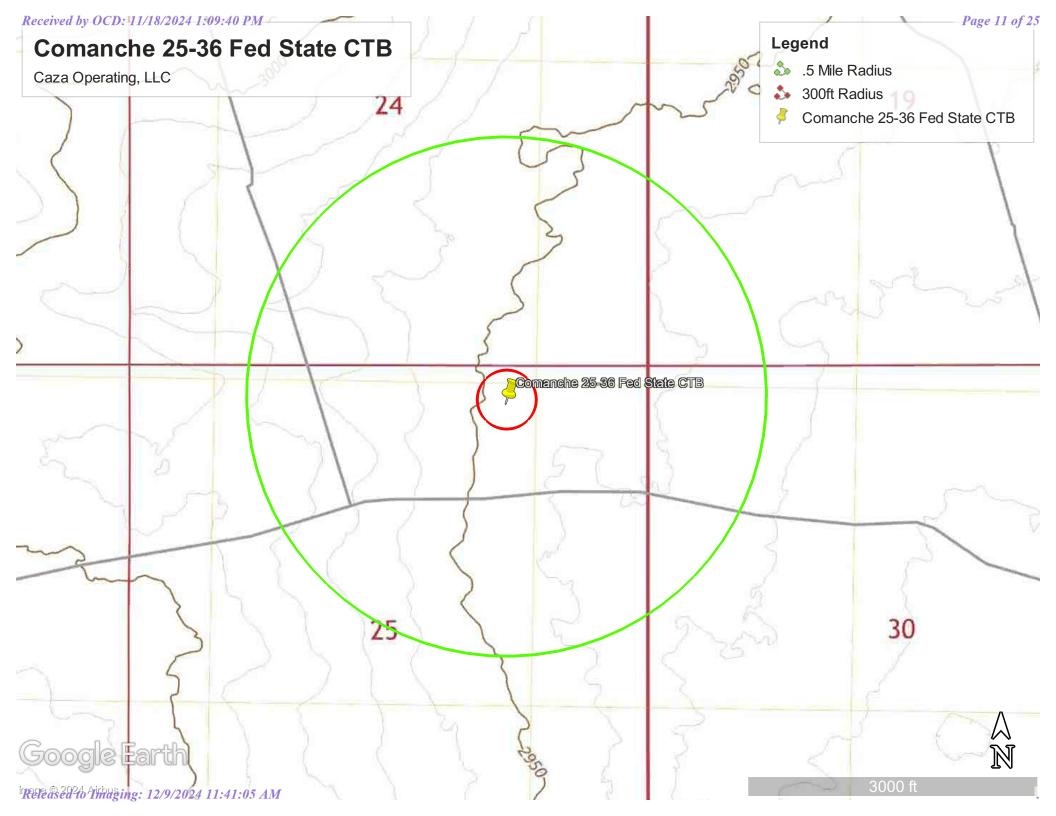


Oil, New

L _ _ PLSS Second Division



BLM, OCD, New Mexico Tech, Esri Community Maps Contributors, Texas Parks & Wildlife, © OpenStreetMap, Microsoft, CONANP, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS, Oil Conservation Division of the New Mexico Energy,





Wetlands Map



September 4, 2024

Wetlands

Estuarine and Marine Deepwater

Estuarine and Marine Wetland

Freshwater Emergent Wetland

Freshwater Forested/Shrub Wetland

Freshwater Pond

Lake

Other

Riverine

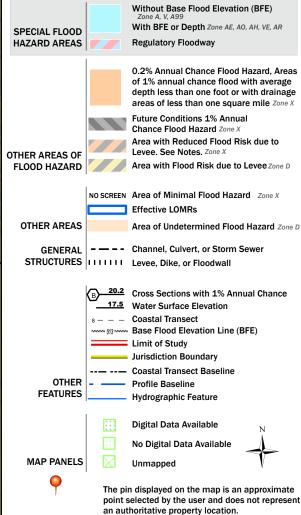
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Received by OCD: 11/18/2024 1:09:40 PM National Flood Hazard Layer FIRMette



Legend

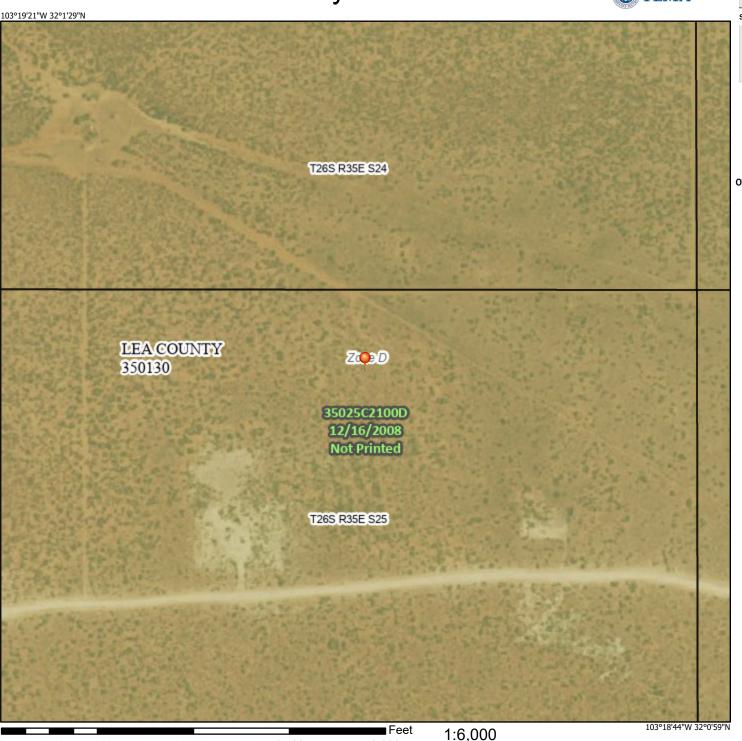
SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/30/2024 at 1:10 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.





WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

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FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 06/08/2012)

FILE NUMBER C-3795

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LiveStock

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C- 3795 265.35E.24.3.4.4 Released to Imaging: 12/9/2024 11:41:05 AM

FILE NUMBER

Photoghraphic Log

NTGE Project No: 248966



PHOTOGRAPHIC LOG

Caza Operating, LLC.

Photograph No. 1

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



Photograph No. 2

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



Photograph No. 3

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



PHOTOGRAPHIC LOG

Caza Operating, LLC.

Photograph No. 4

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



Photograph No. 5

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



Photograph No. 6

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



PHOTOGRAPHIC LOG

Caza Operating, LLC.

Photograph No. 7

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



Photograph No. 8

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



Photograph No. 9

Facility: Comanche 25-36 Fed State CTB

County: Lea County, New Mexico

Description: Liner Inspection



Sante Fe Main Office Phone: (505) 476-3441 General Information

Phone: (505) 629-6116
Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Action 404373

QUESTIONS

ı	Operator:	OGRID:
ı	CAZA OPERATING, LLC	249099
ı	200 N Loraine St	Action Number:
ı	Midland, TX 79701	404373
ı		Action Type:
ı		[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2213324254
Incident Name	NAPP2213324254 COMANCHE 25-36 FED STATE CTB @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source		
Please answer all the questions in this group.		
Site Name	Comanche 25-36 Fed State CTB	
Date Release Discovered	05/10/2022	
Surface Owner	Private	

ncident Details		
Please answer all the questions in this group.		
Incident Type	Produced Water Release	
Did this release result in a fire or is the result of a fire	No	
Did this release result in any injuries	No	
Has this release reached or does it have a reasonable probability of reaching a watercourse	No	
Has this release endangered or does it have a reasonable probability of endangering public health	No	
Has this release substantially damaged or will it substantially damage property or the environment	No	
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No	

Nature and Volume of Release			
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.			
Crude Oil Released (bbls) Details	Not answered.		
Produced Water Released (bbls) Details	Cause: Equipment Failure Fitting Produced Water Released: 10 BBL Recovered: 10 BBL Lost: 0 BBL.		
Is the concentration of chloride in the produced water >10,000 mg/l	No		
Condensate Released (bbls) Details	Not answered.		
Natural Gas Vented (Mcf) Details	Not answered.		
Natural Gas Flared (Mcf) Details	Not answered.		
Other Released Details	Not answered.		
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.		

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS, Page 2

Action 404373

QUESTI	ONS (continued)
Operator: CAZA OPERATING, LLC 200 N Loraine St Midland, TX 79701	OGRID: 249099 Action Number: 404373 Action Type:
QUESTIONS	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)
Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e.	e. gas only) are to be submitted on the C-129 form.
Initial Response The responsible party must undertake the following actions immediately unless they could create a s	
The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.
	ation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative ted or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of valuation in the follow-up C-141 submission.
to report and/or file certain release notifications and perform corrective actions for releate OCD does not relieve the operator of liability should their operations have failed to a	knowledge and understand that pursuant to OCD rules and regulations all operators are required asses which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface t does not relieve the operator of responsibility for compliance with any other federal, state, or
I hereby agree and sign off to the above statement	Name: Kelly Arrendondo Title: Production Reporting Manager Email: karredondo@ntglobal.com Date: 08/14/2024

Sante Fe Main Office Phone: (505) 476-3441 General Information

Phone: (505) 629-6116

Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS, Page 3

Action 404373

QUESTIONS (continued)

Operator:	OGRID:
CAZA OPERATING, LLC	249099
200 N Loraine St	Action Number:
Midland, TX 79701	404373
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
Please answer all the questions in this group (only required when seeking remediation plan approva release discovery date.	l and beyond). This information must be provided to the appropriate district office no later than 90 days after the
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release ar	nd the following surface areas:
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan				
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.				
Requesting a remediation plan approval with this submission	Yes			
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.				
Have the lateral and vertical extents of contamination been fully delineated	Yes			
Was this release entirely contained within a lined containment area	Yes			
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.				
On what estimated date will the remediation commence	11/05/2024			
On what date will (or did) the final sampling or liner inspection occur	11/13/2024			
On what date will (or was) the remediation complete(d)	11/05/2024			
What is the estimated surface area (in square feet) that will be remediated	7400			
What is the estimated volume (in cubic yards) that will be remediated	0			
These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.				
The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to				

significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS, Page 4

Action 404373

QUESTIONS (continued)

ı	Operator:	OGRID:
ı	CAZA OPERATING, LLC	249099
ı	200 N Loraine St	Action Number:
ı	Midland, TX 79701	404373
ı		Action Type:
ı		[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)		
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.		
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:		
(Select all answers below that apply.)		
Is (or was) there affected material present needing to be removed	Yes	
Is (or was) there a power wash of the lined containment area (to be) performed	Yes	
OTHER (Non-listed remedial process)	No	
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC		

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC which includes the anticipated timelines for beginning and completing the remediation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement

Name: Kelly Arrendondo Title: Production Reporting Manager Email: karredondo@ntglobal.com

Date: 11/18/2024

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe. NM 87505

QUESTIONS, Page 6

Action 404373

Santa Fe, NM 87505					
QUESTIONS (continued)					
Operator: CAZA OPERATING, LLC 200 N Loraine St Midland, TX 79701	OGRID: 249099 Action Number: 404373 Action Type:				
QUESTIONS	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)				
Liner Inspection Information					
Last liner inspection notification (C-141L) recorded	401068				
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	11/13/2024				
Was all the impacted materials removed from the liner	Yes				
What was the liner inspection surface area in square feet	7200				
Remediation Closure Request Only answer the questions in this group if seeking remediation closure for this release because all reserved in the question of the group if seeking remediation closure for this release because all reserved in the question of the groups of	Yes Yes Yes 7400 0 n/a n/a Closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a				
comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC. I hereby certify that the information given above is true and complete to the best of my to report and/or file certain release notifications and perform corrective actions for releate the OCD does not relieve the operator of liability should their operations have failed to water, human health or the environment. In addition, OCD acceptance of a C-141 report	notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of knowledge and understand that pursuant to OCD rules and regulations all operators are required asses which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface it does not relieve the operator of responsibility for compliance with any other federal, state, or ially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed				
I hereby agree and sign off to the above statement	Name: Kelly Arrendondo Title: Production Reporting Manager Email: karredondo@ntglobal.com				

Date: 11/18/2024

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CONDITIONS

Action 404373

CONDITIONS

Operator:	OGRID:
CAZA OPERATING, LLC	249099
200 N Loraine St	Action Number:
Midland, TX 79701	404373
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Liner inspection approved, release resolved.	12/9/2024